

From: [Jonah Santiago-Pagan](#)
To: [Emily Hoff](#)
Subject: FW: ALVARADO v. COP, et al. [JOINT STATEMENTS]
Date: Wednesday, September 18, 2024 5:21:59 PM

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From: Jonah Santiago-Pagan
Sent: Monday, August 12, 2024 4:18 PM
To: Keith West <keith@victimrecoverylaw.com>
Cc: davidthiruselvam@yahoo.com; Emily Hoff <Emily.Hoff@phila.gov>
Subject: RE: ALVARADO v. COP, et al. [JOINT STATEMENTS]

Great, thank you Keith. I will send a teams invite and we can all chat about the agreements and items in dispute in re the jury instructions, verdict, voir dire, etc.

Talk then!

Jonah

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From: Keith West <keith@victimrecoverylaw.com>
Sent: Monday, August 12, 2024 4:03 PM
To: Jonah Santiago-Pagan <Jonah.Santiago-Pagan@Phila.gov>
Cc: davidthiruselvam@yahoo.com; Emily Hoff <Emily.Hoff@phila.gov>
Subject: Re: ALVARADO v. COP, et al. [JOINT STATEMENTS]

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8/27 at 4:30 is fine.

Keith West
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On Mon, Aug 12, 2024 at 4:48 PM Jonah Santiago-Pagan <Jonah.Santiago-Pagan@phila.gov> wrote:

Hello Keith,

What we are asking for documents wise is the documents that your experts relied on and reviewed to come to their opinions.

We can do 8/27 – can you do 4:30 PM? Thanks.

Jonah

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From: Keith West <keith@victimrecoverylaw.com>
Sent: Wednesday, August 7, 2024 11:40 AM
To: Jonah Santiago-Pagan <Jonah.Santiago-Pagan@Phila.gov>
Cc: davidthiruselvam@yahoo.com; Emily Hoff <Emily.Hoff@phila.gov>
Subject: Re: ALVARADO v. COP, et al. [JOINT STATEMENTS]

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The CVs for Glenn Garrels and Dr. Veronique Valerie are attached hereto. Can you be more specific re "underlying documents" that you request? For a discussion of the trial stuff, David and I will be on vacation from 8/9 to 8/24. I will be in Brazil and he will be in Australia. Although a Sunday, do you have any availability on 8/25? The next day I am free is Tuesday, 8/27.

Best wishes,

Keith West
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On Tue, Aug 6, 2024 at 1:39 PM Jonah Santiago-Pagan <Jonah.Santiago-Pagan@phila.gov> wrote:

Hello Keith and David,

Following up on your availability the week of August 19, 2024. Given the deadlines in this case, we want to get this discussion on the books.

Additionally, we never received the CV of either expert or the underlying documents they based their opinions on – the deadline for that exchange was October 27, 2023 - please send that to us by this Friday August 9, 2024.

Thank you,

Jonah

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From: Jonah Santiago-Pagan
Sent: Tuesday, July 30, 2024 1:41 PM
To: Keith West <keith@victimrecoverylaw.com>
Cc: davidthiruselvam@yahoo.com; Emily Hoff <Emily.Hoff@phila.gov>
Subject: ALVARADO v. COP, et al. [JOINT STATEMENTS]

Hello Keith and David,

Judge Murphy's policies and procedures require our pre-trial memos and trial related documents (jury instructions, voir dire, verdict sheet, etc.) to be filed jointly

if possible and if not then with all disputes outlined and described – see sections 12-15 of Judge Murphy's policies and procedures attached.

The policies and procedures are very specific, and we want to make sure we have time to fully discuss and resolve the matters outlined therein ahead of the filing deadlines. To that end, what is your availability to discuss the pre-trial filings the week of August 19, 2024?

Thank you very much.

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